

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

DUANE & VIRGINIA LANIER  
TRUST, on behalf of Himself and all  
others similarly situated,

Plaintiff,

v.

(1) SANDRIDGE ENERGY, INC.  
(2) SANDRIDGE MISSISSIPPIAN  
TRUST I,  
(3) SANDRIDGE MISSISSIPPIAN  
TRUST II,  
(4) TOM L. WARD,  
(5) JAMES D. BENNETT,  
(6) MATTHEW K. GRUBB,  
(7) RANDALL D. COOLEY,  
(8) JIM J. BREWER,  
(9) EVERETT R. DOBSON,  
(10) WILLIAM A GILLILAND,  
(11) DANIEL W. JORDAN,  
(12) ROY T. OLIVER, JR.,  
(13) JEFFREY S. SEROTA,  
(14) D. DWIGHT SCOTT,  
(15) RAYMOND JAMES &  
ASSOCIATES, INC.,  
(16) MORGAN STANLEY & CO.,  
LLC,  
(17) MERRILL LYNCH, PIERCE,  
FENNER & SMITH, INC.,  
(18) CITIGROUP GLOBAL  
MARKETS, INC., and  
(19) RBC CAPITAL MARKETS, LLC

Defendants.

Case No. CIV-15-0634-M

**JOINT MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S  
COMPLAINT AND SCHEDULING ORDER**

WHEREAS Plaintiff Duane & Virginia Lanier Trust filed its complaint in the above captioned case on June 9, 2015 against the Defendants named in the caption above (collectively "Defendants") alleging certain violations of the federal securities laws;

WHEREAS the Private Securities Litigation Reform Act (15 USC § 77z-1)

provides for the appointment of a lead plaintiff in putative securities class actions including this action;

WHEREAS Plaintiff has indicated that it intends to file a motion in the near future seeking appointment as lead plaintiff and approval of its counsel as lead counsel in this matter;

WHEREAS if the Plaintiff is appointed lead plaintiff and its counsel is approved, Plaintiff intends to file a consolidated amended complaint following such appointment. (The Parties anticipate that regardless of who is appointed as lead plaintiff in this case, their counsel will file a consolidated amended complaint); and

WHEREAS the Plaintiff and the Defendants have agreed to extend the Defendants' time to answer or otherwise respond to the present complaint until after a lead plaintiff is appointed and a consolidated amended complaint is filed, while reserving all other defenses and arguments;

Now, therefore, the Parties jointly move the Court to stay Defendants' obligation to respond to the existing complaint and to set the following schedule for the filing of a consolidated amended complaint and pleadings or motions responsive thereto;

Pursuant to Local Civil Rule 7.1(h), the Parties state that Plaintiffs' commenced serving Defendants on or about June 11, 2015, and an Answer or other responsive pleading must be filed within 21 days of service pursuant to Fed. R. Civ. Proc. 12(a). The schedule proposed in this joint motion would enlarge and extend both the Defendants' deadline to respond to the Complaint and the deadline to respond to the

consolidated amended complaint, if and when filed, as well as the regular briefing schedule for Motions established in Local Civil Rule 7.1(g) and (i).

1. Within 45 days of entry of the Order appointing lead plaintiff, the lead plaintiff will file a consolidated amended complaint.

2. Defendants will have 60 days after the filing of the consolidated amended complaint to file a motion to dismiss or other responsive pleading.

3. Plaintiff(s) will have 60 days after the filing of the motion to dismiss, if one is filed, in which to file its (their) opposition.

4. Defendants will have 30 days after the filing of the opposition papers in which to file their reply, if any.

5. In light of the anticipated filing of a consolidated amended complaint, Defendants shall have no obligation to answer or move in response to the existing complaint on file in this action. All defenses to the existing complaint are reserved.

6. This represents the first request for an extension of time for any of the Defendants to respond to the complaint in this case. This request will not impact the trial date or any other deadline in this case as no other deadlines have been set.

7. A proposed order is filed concurrently herewith.

WHEREFORE, the Parties respectfully request that the Court enter an order setting the requested schedule for the filing of and responses to a consolidated amended complaint.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I certify that on the 19th day of June, 2015, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the appropriate ECF registrants.

By: s/ Thomas Snyder